

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
Shulem Krangel,

Plaintiffs,

1:15-cv-05289-RRM-CLP

v.

American Coradius International LLC

Defendant,

-----X  
NOTICE OF VOLUNTARY DISMISSAL BY THE PLAINTIFF PURSUANT  
TO RULE 41(a)(1)(A)(ii)

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), and as the Defendants have neither answered nor moved for summary judgment, undersigned counsel on behalf of the Plaintiff hereby voluntarily dismisses the pending action with prejudice as to the Plaintiff and without prejudice as to the unnamed putative class members if any.

Dated: Brooklyn, New York  
December 18, 2015

Respectfully submitted,

LAW OFFICES OF DAVID PALACE

By: /s/ David Palace  
383 Kingston Ave, #113  
Brooklyn, NY 11213  
Tel: (347) 651-1077  
Fax: (347) 464-0012

Attorneys for Plaintiff